

The State of New Hampshire

Department of Environmental Services



Michael P. Nolin Commissioner

December 23, 2005

Mr. Wade Neilly Plant Manager UniFirst Corporation 125 Etna Road Lebanon, New Hampshire 03766 CERTIFIED MAIL (7099 3400 0018 1290 6665) RETURN RECEIPT REOUESTED

NOTICE OF PAST VIOLATION (Sta.S)

RE: NOTICE OF PAST VIOLATION

Dear Mr. Neilly:

On April 14, 2005, the New Hampshire Department of Environmental Services, Air Resources Division ("DES") conducted a compliance inspection at the UniFirst Corporation ("UniFirst") at 125 Etna Road in Lebanon, New Hampshire. The purpose of the inspection was to determine UniFirst's compliance with NH Administrative Rules Env-A 100 *et seq.*, and State Permit to Operate PO-B-1694 ("the Permit"). The purpose of this letter is to notify you of the violations discovered during the inspection. The specific violations are as follows:

- 1. Section IX. Reporting Requirements of the Permit and Env-A 907.01 require UniFirst to submit an annual emissions report which includes the actual emissions of the stationary source and the methods used in calculating such emissions in accordance with Env-A 705.02. The annual emissions report is required to be submitted on or before April 15th of the following year. DES received UniFirst's annual emissions reports for the calendar year 1999 on September 22, 2000, and for calendar years 2000 and 2001 on April 19, 2005. UniFirst's annual emissions reports for the years 2002, 2003 and 2004 were received by DES in a timely manner.
- 2. Section XI. Emission–Based Fee Requirements of the Permit and Env-A 705.01 require UniFirst to annually pay emission-based fees for all permitted devices in accordance with Env-A 705.04. Emission fees for each year prior to calendar year 2004 were due by October 15th of the following year. Emission fees for calendar year 2004 were due July 15, 2005. For subsequent calendar years after 2004, the annual emissions fees are due on or before April 15th of the following year. On May 17, 2005, DES received a check in the amount of \$6,416.86 from UniFirst for emission fees for calendar years 1999, 2000, 2001, 2003 and 2004. UniFirst's 2002 emission fees were submitted to DES in a timely manner.

DES recognizes the efforts that UniFirst has taken to come into compliance. Accordingly, no further action in response to the listed violations is required.

DES requests that UniFirst comply with all future obligations contained in the Permit and wants to remind UniFirst that the annual emissions report and emission fee payment for calendar year 2005 emissions are both due by April 15, 2006. In the event that other violations are identified, DES may take action against UniFirst, including issuing an administrative order, seeking administrative fines, and/or referring this matter to the NH Department of Justice.

If you believe that DES has cited these violations in error, or have questions regarding these matters, please contact Barbara Hoffman at (603) 271-7874, Air Resources Division, Compliance Bureau. A current copy of the Air Resource Division rules can be obtained from the DES website at http://www.des.nh.gov/rules/air.htm or by contacting the Public Information Center at (603) 271-2975.

Sincerely,

Pamela G. Monroe

Compliance Bureau Administrator

Air Resources Division

PGM/asb

cc:

R. Kurowski, EPA Region 1

G. Hamel, NHDES Legal Unit Administrator Mayor James C. Dean, City of Lebanon

Source File